

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	CIVIL NO. 98-1664 (CCC)
)	CIVIL NO. 98-2344 (CCC)
vs.)	Consolidated Cases
)	
33.92536 ACRES OF LAND, MORE)	
OR LESS, SITUATED IN VEGA BAJA,)	
COMMONWEALTH OF PUERTO RICO,)	
AND JUAN PIZA BLONDET, AND)	
UNKNOWN OWNERS)	
)	
Defendants.)	

JOINT MOTION FOR ENLARGEMENT OF TIME

Plaintiff United States of America (“Plaintiff” or the “Government”) and Defendant Juan Piza-Blondet (“Defendant”), pursuant to this Court’s November 17, 2005 Order adopting the current discovery and pretrial schedule (Dkt. 116 and 117), respectfully submit this Joint Motion for an Enlargement of Time for discovery and pretrial deadlines. There being good cause for this motion, the parties state as follows:

1. The parties continue to work in an amicable manner to exchange written discovery materials and expert reports.
2. Because of delays associated with the recent holidays, jury trials in other cases, and for various other reasons, neither party will be able to comply with the January 9, 2006 deadline for the exchange of Rule 26(a)(2) rebuttal reports.
3. The parties believe that a 30-day extension would allow them to complete and exchange rebuttal reports, and enable them to better respond to written discovery requests and prepare for upcoming expert witness depositions.

4. The parties will continue to work together amicably in order to ensure the timely exchange of written discovery and expert reports, the orderly scheduling of depositions, and the efficient execution and completion of this proposed discovery period.

Accordingly, the parties jointly propose the following discovery schedule and pretrial deadlines:

Exchange of Rule 26(a)(2) Rebuttal Reports	February 9, 2006
Close of Discovery	March 15, 2006
Court-ordered Settlement Conference	On or After March 31, 2006
<u>Daubert</u> Motions	May 1, 2006

Counsel for Defendant has reviewed this motion, and has authorized undersigned counsel to submit this as a joint motion.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on this 9th day of January, 2006, a true and correct copy of the foregoing Plaintiff's First Request for Production was served via email and electronic filing addressed to:

Maurice V. Piza, Esq.
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David C. Vidrine, Esq.
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_____/s Jeffrey M. Tapick_____

ORDER

IT IS HEREBY ORDERED, that the Joint Motion to Enlarge Time is hereby **GRANTED**.

IT IS FURTHER ORDERED, that the following discovery and pretrial deadlines be adopted in this proceeding:

Exchange of Rule 26(a)(2) Rebuttal Reports	February 9, 2006
Close of Discovery	March 15, 2006
Court-Ordered Settlement Conference	On or After March 31, 2006
<u>Daubert</u> Motions	May 1, 2006

San Juan, Puerto Rico this ____ day of _____ 200__.

DISTRICT JUDGE